

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**JEREMY TRAVIS PAIGE, #R5845**

**PLAINTIFF**

**v.**

**CAUSE NO. 3:20cv197-FKB**

**RANKIN COUNTY, ET AL.**

**DEFENDANTS**

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**MOTION FOR SUMMARY JUDGMENT**

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**NOW COME** Defendants Rankin County, Sheriff Bryan Bailey, in his individual capacity, and Brett McAlpin, in his individual capacity, by and through counsel, and move this Court for summary judgment pursuant to FED. R. CIV. P. 56 by stating as follows:

1. Plaintiff Jeremy Travis Paige ("Paige"), proceeding *pro se*, bring his § 1983 claims and asserts that his Fourth and Fourteenth Amendment rights were violated on or around August 1-2, 2018.

2. There exists no genuine issue of material fact which would preclude the grant of summary judgment to Defendants with respect to all claims asserted against them, and accordingly, they are entitled to summary judgment pursuant to FED. R. CIV. P. 56.

3. Sheriff Bailey and Investigator McAlpin, in their individual capacities, are entitled to qualified immunity.

4. Paige cannot establish that he suffered a violation of his constitutional rights proximately caused by Investigator McAlpin or any other employee of Rankin County. Furthermore, Paige cannot establish that he suffered any constitutional harm which was inflicted pursuant to an official policy, practice, or custom of Rankin County, maintained with deliberate indifference.

5. For these reasons and premised upon all case law precedent and analysis in Defendants' accompanying Memorandum of Authorities, Rankin County, Sheriff Bailey, and Investigator McAlpin respectfully request that this Court grant their instant Motion for Summary Judgment pursuant to FED. R. CIV. P. 56 and dismiss any and all claims against them, in their entirety, with prejudice.

6. In support of their instant Motion, Defendants attach hereto and rely upon the following exhibits:

- a. **Exhibit 1** - Complaint;
- b. **Exhibit 2** - Affidavit of Brett McAlpin;
- c. **Exhibit 3** - Hearing Transcript;
- d. **Exhibit 4** - Inmate / Medical Records (to be filed conventionally, under seal);
- e. **Exhibit 5** - Criminal Pleadings; and
- f. **Exhibit 6** - Policies & Procedures.

**WHEREFORE, PREMISES CONSIDERED**, Defendants pray that this Court grant their Motion for Summary Judgment and dismiss any and all claims against them with prejudice.

**RESPECTFULLY SUBMITTED**, this 13<sup>th</sup> day of August, 2021.

**RANKIN COUNTY, SHERIFF BRYAN BAILEY, &  
BRETT MCALPIN - DEFENDANTS**

**BY:** /s/ Jason E. Dare  
**JASON E. DARE**

**OF COUNSEL:**

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**CERTIFICATE OF SERVICE**

I, JASON E. DARE, hereby certify that on this day, I electronically filed the foregoing with the Clerk of the Court using the ECF system, and further certify that I have mailed, via U.S. Mail, postage pre-paid, a true and correct copy of the above and foregoing document to the following non-ECF participant(s):

Jeremy Travis Paige, R5845  
3800 Baldwin County Road  
Greenwood, MS 38930

**THIS**, the 13<sup>th</sup> day of August, 2021.

/s/ Jason E. Dare  
**JASON E. DARE**